

## **Remarks**

The above Amendments and these Remarks are in reply to the Office action mailed September 27, 2007. Currently, claims 13 and 23-25 are pending. Applicants have amended claim 23. Applicants respectfully request reconsideration of claims 13 and 23-25.

### **I. Summary of the Examiner's Objections**

Claims 23-25 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement.

Claims 23-25 were rejected under 35 U.S.C. §112, second paragraph, as being incomplete for omitting essential steps, such omission amounting to a gap between the steps.

### **II. Summary of the Amendments**

Applicant has amended claim 23.

### **III. Rejection under 35 U.S.C. § 112, First Paragraph**

The Examiner rejected claims 23-25 under 35 USC §112, first paragraph, as failing to comply with the written description requirement. In particular, the Examiner indicated that claim 23 required only one iteration and comparison and does not define what a difference represents and what a threshold is rated to.

Select features of embodiments of Applicants' invention as described above can be found in claim 23. Amendments to claim 23 are supported by the Specification, including paragraph 73. Applicants have amended claim 23 to expedite prosecution and reserves the right to reintroduce claims 23-25 as originally filed or in their previously amended format. Claim 23 recites:

finding a door gap in the drawing;  
determining a room relative to said door; and  
marking said drawing to indicate a room definition,  
wherein the step of finding a door gap includes performing the sub-steps of:  
selecting a first group of contact points and a second group of contact points,  
identifying a first point and a second point in the first group of contact points,  
determining a line between the first point and the second point,

determining a second line between the second point and a third point, the third point contained in either the first group of contact points or the second group of contact points,

comparing the first line and the second line to determine a difference in length between the lines,

determining if the difference is greater than a length threshold,

repeating said sub-steps of identifying, determining, and comparing, if needed, with additional points until a difference between two lines is greater than the length threshold, and

identifying the door gap as an edge associated with a difference that is greater than the length threshold.

The element which recites “repeating said sub-steps of identifying, determining, and comparing, if needed,” indicates that more than one iteration may be performed and there is not requirement of a single iteration and comparison. The element which recites “comparing the first line and the second line to determine a difference in length” indicates that the difference represents a length. The element of “until a difference between two lines is greater than the length threshold” indicates that the difference between two lines is compared to the length threshold to determine if the difference is greater than the two lines.

Applicants submit that amended claim 23 overcomes the rejections under 35 USC §112, first paragraph, and requests the rejection to claim 23 be withdrawn, as well as dependent claims 24-25 which depend from claim 23.

#### **IV. Rejection under 35 U.S.C. § 112, Second Paragraph**

The Examiner rejected claims 23-25 under 35 USC §112, second paragraph, as being incomplete for omitting essential steps. In particular, the Examiner indicated that claim 23 was missing a nexus between “comparing the first and second crossing edges” and “finding a door gap” and that nothing is done after the comparison that would result in the finding of a door gap.

The element which recites “identifying the door gap as an edge associated with a difference that is greater than the length threshold” is performed after the step of comparing and provides a nexus between finding an edge and finding a door gap.

Applicants submit that amended claim 23 overcomes the rejections under 35 USC §112, second paragraph, and requests the rejection to claim 23 be withdrawn, as well as dependent claims 24-25 which depend from claim 23.

**Conclusion**

Based on the above amendments and these remarks, reconsideration of claims 13 and 23-25 is respectfully requested.

The Examiner's prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned attorney by telephone.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: November 27, 2007

By: /Stephen R. Bachmann/

Stephen R. Bachmann  
Reg. No. 50,806

VIERRA MAGEN MARCUS & DENIRO LLP  
575 Market Street, Suite 2500  
San Francisco, CA 94105-2871  
Telephone: (415) 369-9660  
Facsimile: (415) 369-9665